

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

PRINCETON DIGITAL IMAGE
CORPORATION,

Plaintiff,

-v-

HEWLETT-PACKARD., *et al.*,

Defendants.

No. 12 Civ. 779 (RJS) [rel. Civ. 6973]

PRINCETON DIGITAL IMAGE
CORPORATION,

Plaintiff,

-v-

FACEBOOK INC., *et al.*,

Defendants.

No. 12 Civ. 6973 (RJS) [rel. Civ. 779]

**NOTICE OF DEFENDANTS' MOTION FOR RECONSIDERATION OF ORDER
DENYING MOTION TO DISMISS FOR LACK OF STANDING OR, IN THE
ALTERNATIVE, FOR CERTIFICATION PURSUANT TO 28 U.S.C. § 1292(B)**

PLEASE TAKE NOTICE THAT, upon the accompanying memoranda of law and all of the pleadings filed herein, defendants FUJIFILM North America Corporation, Hewlett-Packard Company, and Xerox International Partners in the 773 Case; and defendants Facebook, Inc., Corbis Corporation, and Getty Images (US), Inc. in the 6973 Case (collectively “Defendants”) hereby move pursuant to Local Civil Rule 6.3 for reconsideration of the Court’s March 21, 2013 Memorandum and Order (Doc. 282 in the 773 Case and Doc. 213 in the 6973 Case) denying Defendants’ motion to dismiss PDIC’s complaints pursuant to Federal Rule of Civil Procedure 12(b)(1) for lack of standing. In the alternative, Defendants request that the Court certify its Order for immediate appeal under 28 U.S.C. § 1292(b).

PLEASE TAKE FURTHER NOTICE that no oral argument shall be heard unless directed by the Court.

Dated: April 5, 2013

s/ Sean C. Cunningham
Sean C. Cunningham (*pro hac vice*)
sean.cunningham@dlapiper.com
Erin P. Gibson (*pro hac vice*)
erin.gibson@dlapiper.com
DLA PIPER US LLP
401 B Street, Suite 1700
San Diego, CA 92101
Telephone: 619-699-2700
Facsimile: 619-699-2701

Brian K. Erickson (*pro hac vice*)
brian.erickson@dlapiper.com
DLA PIPER US LLP
401 Congress Ave., Suite 2500
Austin, TX 78701-3799
Telephone: 512-457-7059
Facsimile: 512-457-7001

**ATTORNEYS FOR DEFENDANT
HEWLETT-PACKARD COMPANY**

s/ Steven J. Routh (with permission)

Steven J. Routh (*pro hac vice*)

srouth@orrick.com

LEAD ATTORNEY

Sten A. Jensen (*pro hac vice*)

sjensen@orrick.com

ORRICK, HERRINGTON & SUTCLIFFE LLP

1152 15th Street, NW

Washington DC 20005

Telephone: 202-339-8400

Facsimile: 202-339-8500

Clifford R. Michel

cmichel@orrick.com

ORRICK, HERRINGTON & SUTCLIFFE LLP

51 West 52nd Street

New York, NY 10019

Telephone: 212-506-5000

Facsimile: 212-506-5151

**ATTORNEYS FOR DEFENDANT FUJIFILM
NORTH AMERICA CORPORATION**

s/ Richard A. Williamson (with permission)

Richard A. Williamson

rwilliamson@fzwz.com

Craig S. Kesch

ckesch@fzwz.com

**FLEMMING ZULACK WILLIAMSON
ZAUDERER LLP**

One Liberty Plaza

New York, New York 10006-1404

Tel: (212) 412-9500

Fax: (212) 964-9200

William H. Mandir (*pro hac vice*)

wmandir@sughrue.com

John F. Rabena (*pro hac vice*)

jrabena@sughrue.com

Yoshinari Kishimoto (*pro hac vice*)

ykishimoto@sughrue.com

Kelly G. Hyndman (*pro hac vice*)

kghyndman@sughrue.com

Brian K. Shelton (*pro hac vice*)

bshelton@sughrue.com

SUGHRUE MION, PLLC
2100 Pennsylvania Ave., NW
Washington, DC 20037
Telephone: 202-775-7515
Facsimile: 202-293-7860

**ATTORNEYS FOR DEFENDANT
XEROX INTERNATIONAL PARTNERS**

/s/ Heidi Lyn Keefe (with permission)

Heidi Lyn Keefe
Elizabeth L. Stameshkin
Mark Randolph Weinstein
Cooley LLP
5 Palo Alto Square
3000 El Camino Real
Palo Alto, CA 94306
Telephone: 650-843-5000
Facsimile: 650-849-7400
hkeefe@cooley.com
lstameshkin@cooley.com
mweinstein@cooley.com

Michael Graham Rhodes
Cooley LLP
101 California Street, 5th Floor
San Francisco, CA 94111
Telephone: 415-693-2000
Facsimile: 415-963-2222
rhodesmg@cooley.com

Jeffrey Norberg
Cooley, LLP
3175 Hanover Street
Palo Alto, CA 94304
Telephone: 650-843-5000
Facsimile: 650-857-0663
jnorberg@cooley.com

Deron R. Dacus
The Dacus Firm, PC
821 ESE Loop 323, Suite 430
Tyler, TX 75701
Telephone: 903-705-1117
Facsimile: 903-705-1117
ddacus@dacusfirm.com

**ATTORNEYS FOR DEFENDANT
FACEBOOK, INC.**

/s/ Christopher Schenck (with permission)

Christopher Schenck
Bracewell & Giuliani – Seattle
701 Fifth Avenue, Suite 600
Seattle, WA 98104
Telephone: 206-204-6200
Facsimile: 206-204-6262
chris.schenck@bgllp.com

Alan D. Albright
Benjamin Lee Bernell
Bracewell & Giuliani – Austin
111 Congress Avenue, Suite 2300
Austin, TX 78701
Telephone: 512-472-7800
Facsimile: 512-472-9123
alan.albright@bgllp.com
ben.bernell@bgllp.com

John Allen Yates
Bracewell & Giuliani – Houston
711 Louisiana St., Suite 2300
Houston, TX 77002
Telephone: 713-221-1375
Facsimile: 713-222-3296
jay.yates@bgll.com

**ATTORNEYS FOR DEFENDANT
CORBIS CORPORATION**

/s/ Ramsey M. Al-Salam (with permission)

Ramsey M. Al-Salam
Sher S. Kung
Perkins Coie LLP (Seattle)
1201 Third Avenue, 40th Floor
Seattle, WA 98101
Telephone: 206-359-6385
Facsimile: 206-359-7385
skung@perkinscoie.com
ralsalam@perkinscoie.com

Manny Joseph Caixeiro
Perkins Coie LLP

30 Rockefeller Plaza, 25th Floor
New York, NY 10112
Telephone: 212-977-6900
Facsimile: 212-977-1649
mcaixeiro@perkinscoie.com

**ATTORNEYS FOR DEFENDANT
GETTY IMAGES (US), INC.**